

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO.: 1:24-cv-12403-FDS

LUBAVITCH OF CAMBRIDGE, INC.

Plaintiff,

v.

CAMBRIDGE BOARD OF ZONING APPEAL
and CITY OF CAMBRIDGE,

Defendants,

**DEFENDANTS' ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING**

NOW COME the Defendants, Cambridge Board of Zoning Appeal and City of Cambridge (the "Defendants") and respectfully move this Honorable Court, with the assent of the Plaintiff, for a thirty (30) day extension of time to and including November 14, 2024 to file a responsive pleading. As grounds, the Defendants state as follows:

1. The Plaintiff commenced this action on September 20, 2024, asserting claims for violation of the First and Fourteenth Amendments to the U.S. Constitution, RLUIPA, Article 2 of the Declaration of Rights of the Massachusetts Constitution, and Massachusetts General Laws, c. 12 § 11.
2. On September 23, 2024, the Plaintiff's Complaint was served upon the Defendants.
3. The Plaintiff's Complaint contains 187 paragraphs and seven (7) separate causes of action to which the Defendants must respond.

4. The Defendants require additional time to investigate the claims contained in Plaintiff's Complaint and therefore request that this Court extend the date by which they are to file a responsive pleading by thirty (30) days to November 14, 2024.
5. The Plaintiff assents to this motion.

WHEREFORE, the Defendants, Cambridge Board of Zoning Appeal and City of Cambridge, respectfully request that the responsive pleading deadline be extended by thirty (30) days to and including November 14, 2024.

Respectfully submitted,

The Defendants,
CAMBRIDGE BOARD OF ZONING APPEAL
and CITY OF CAMBRIDGE,
By their attorneys,

/s/ Crystal Huff
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Dated: October 8, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those participants indicated as non-registered participants.

/s/ Crystal Huff

Crystal Huff, BBO# 681860

Dated: October 8, 2024